system and ambient, at least one spill over region (190, 192, 194, 196) to communicate the fluid with the second container, and a plurality of channels (137, 138) to communicate the air from the ventilation port between the interior region and the second container, wherein each channel provides a different path capable of channeling air from the ventilation port to the second container (emphasis added). Method claim 11 recites a method of ventilating air using such structure.

As admitted during the November 21 personal interview and acknowledged on page 4 of the Office Action, Carrese fails to teach at least "a plurality of channels to communicate at least the air from the ventilation port between the interior region and the second container, wherein each of the plurality of channels provides a different path capable of channeling air from the ventilation port to the second container" as recited in independent system claims 1 and 10 and similarly recited in independent method claim 11.

Hattori fails to overcome the deficiencies of Carrese with respect to these claims. In particular, in support for the rejection, the Office Action relies on element 12 being a ventilation port, element 50 as the second container, and presumably communicating pipes 14 in Fig. 17A as corresponding to the plurality of channels. Moreover, it is alleged that the motivation would be "to provide better ventilation in the ink chamber." Applicants respectfully disagree and argue that a *prima facie* case of obviousness has not been made.

Fig. 1B and col. 7, lines 1-27 identify element 12 as an ink supply port that communicates with recording head 60 and supplies ink to the head. This is not a ventilation port that communicates with ambient air as alleged. Rather, Hattori clearly shows an atmosphere communicating port 15 located at the top left of chamber 10 that communicates with external air. However, this is provided in and communicates directly with chamber 10. Element 14 is identified as a communicating pipe 14 defining a vapor-liquid exchange path between chamber 10 and chamber 50. Pipe 14 is provided to transfer liquid ink between the

two chambers. Chamber 10 also includes a buffer member 16 disposed in the vicinity of the atmosphere port 15.

From this passage, it is clear that only chamber 10 could correspond to Applicants' second container with a capillary medium and only port 15 communicates air between the interior of the fluid container and ambient and could correspond to the recited ventilation port. Moreover, Hattori clearly provides only a single opening (port 15) that provides a single path that communicates ambient air to the ink container. Thus, Hattori fails to teach "a plurality of channels to communicate at least the air from the ventilation port between the interior region and the second container, wherein each of the plurality of channels provides a different path capable of channeling air from the ventilation port to the second container" as recited in independent system claims 1 and 10 and similarly recited in independent method claim 11.

Moreover, if anything, alleged pipe 14 (which is two pipes in Figs. 17A-B) corresponds to Applicants' wetted passage or Carrese's passage (132, 232), which transfer wetted liquid between the two chambers. Thus, even though two passages are taught in Fig. 17, these passages are for an entirely different purpose than the claimed structure. Accordingly, even if combined with teachings of Carrese, the combination would teach at best that there should be multiple wetted passages (132, 232) in Carrese's Fig. 2 or Fig. 4 embodiment for the purpose of ensuring proper ink delivery.

Hattori fails to provide a spill over region or a small tortuous air communication channel as in Carrese. Thus, the air channel structure of Hattori is incompatible with Carrese. That is, Carrese provides a long, tortuous single air communicating path from vent port 260 to the second chamber to prevent leakage. Contrary to this objective, Hattori provides a direct connection of the second chamber 10 to ambient by providing air port 15 directly on a top wall of the second chamber 10. This completely eliminates the tortuous path of Carrese

and allows leaks of fluid, but arguably would prevent blockage because no overflow passage that could trap ink within the air path is provided. Thus, the two vent and path structures cannot be combined or modified without destroying the intended purpose of Carrese.

Moreover, Hattori does not appreciate problems recognized and solved by Applicants' claimed systems and method. Hattori clearly provides only a single opening (port 15) provided on the wall face that provides a single (very short) path that directly communicates ambient air to the chamber 10. Thus, if the ink supply system of Hattori were tipped over, ink would appear to leak out because of the lack of a spill over region or communicating path of any length. Upon righting of the supply system, there would be no possible blockage. Thus, problems with spilled ink blocking the air supply passage are not appreciated by Hattori. Because of this, Hattori provides no possible motivation to provide a plurality of air communicating channels that communicate with ambient as claimed. The only possible source of motivation is impermissible hindsight consideration of Applicants' specification.

Accordingly, independent claims 1, 10 and 11 and claims dependent therefrom define over Carrese even if combined with Hattori. Withdrawal of the rejection is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-17 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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